ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ
HELLENIC REPUBLIC

Εθνική Αρχή Ανώτατης Εκπαίδευσης
Hellenic Authority for Higher Education

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Athens, 6 November 2026

Ref. No. 58087

DECISION OF THE SUPREME COUNCIL

OF THE HELLENIC AUTHORITY FOR HIGHER EDUCATION

Supreme Council Meeting No. 104/5-11-2026

Subject: "Approval of the Code of Ethics of the Hellenic Authority for Higher Education"

THE SUPREME COUNCIL OF THE HELLENIC AUTHORITY FOR HIGHER EDUCATION

Having regard to

1. The provisions of Law 4653/2020 (A 12) and in particular Articles 3, 4, 4A, 5, 8, 13 and 13A, par. 3, as Article 8 was amended, Article 13 was replaced and Article 13A was added by Articles 88, 89 and 90 of Law 5351/2026 (A' 178) respectively.
2. Article 91, par.2 of Law 5351/2026 concerning the publication of the Code on the Authority's website.
3. Articles 5, 6 and 7 of the Code of Administrative Procedure (Law 2690/1999, A' 45).
4. EU Regulation No. 2016/679 and Law 4624/2019 (A' 137).
5. Law 4795/2021 (A' 62) and Law 4990/2022 (A' 210).
6. The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) and, in particular, standards 2.4 and 3.3.
7. Decision No. 15561/09-04-2020 of the President of the Hellenic Authority for Higher Education (HAHE) on the "Appointment of the four (4) members of the Supreme Council of the Hellenic Authority for Higher Education" (Y.O.D.D. 272), as amended and currently in force.
8. Decision No. 18135/Z1/7-2-2020 of the Minister of Education and Religious Affairs (Y.O.D.D. 94) concerning the appointment of the President of the Supreme Council of the Hellenic Authority for Higher Education, the decision No. 16384/Z1/15-2-2024 of the Minister of Education, Religious Affairs and Sports (Y.O.D.D. 137) concerning the extension of the term of office of the President of the Supreme Council of HAHE, decision No.

88986/Z1/1.08.2024 of the Minister of Education, Religious Affairs and Sports (Government Gazette No. 846/Y.O.D.D./7-8-2024) concerning the renewal of the term of office of the President of the Supreme Council of HAHE, Professor Pericles A. Mitkas.

9. The decisions of the Evaluation and Accreditation Council No. 62/9-7-2026 and 63/30-7-2026 concerning the draft of the updated code of ethics for the accreditation process.
10. The decision of the Supreme Council Meeting No. 104/5-11-2026 (item 3.3).
11. The fact that this decision does not entail any expenditure to be borne by the state budget.

DECIDES

To approve the Code of Ethics for the members of the Supreme Council (S.C.), the Evaluation and Accreditation Council (E.A.C.), the staff of HAHE and the Panels formed pursuant to decisions of the S.C. and the E.A.C., by virtue of Article 90 par. 3 of Law 5351/2026, which reads as follows:

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CODE OF ETHICS

OF THE HELLENIC AUTHORITY FOR HIGHER EDUCATION (HAHE)

The HAHE Code of Ethics forms part of the Authority's regulatory framework and applies to Higher Education Institutions (HEIs) and University Legal Entities (ULEs) under review by the HAHE, as well as to the members of the External Evaluation and Accreditation Panels (EEAPs), the HAHE Review Coordinators, and members of the Evaluation and Accreditation Council (EAC) of HAHE, with the aim of ensuring the integrity and impartiality of the relevant procedures, as specified below.

This Code of Ethics is subject to periodic review and updating in order to reflect developments in accreditation practices within the European Higher Education Area, as well as the applicable national legal framework at any given time. Any substantial amendment to this Code shall be communicated to all parties involved.

1. Members of the Supreme Council (S.C.) of HAHE

The following rules of ethics and professional conduct govern the performance of the duties by members of the Supreme Council of the Hellenic Authority for Higher Education (HAHE) in the context of the decision-making process falling within the scope of their powers under Article 7 of Law 4653/2020 (see in particular paragraph 1(d)) as well as any related activity falling within their institutional role.

In the exercise of their duties, the members of the S.C. shall act in accordance with the applicable legal and regulatory framework of HAHE, the prescribed procedures and the principle of impartial decision-making.

In particular, the SC members shall:

- Carry out their duties with professionalism, accountability, diligence, responsibility and in accordance with the Law.
- Exercise their powers independently and base their decisions on the requirements of HAHE's operational framework. They shall not allow personal opinions, collaborations with Institutions, prior connections, external pressures, political expediency or personal interests to influence their assessment or decisions.

- Act in a spirit of collegiality and cooperation. The SC members participate in deliberations with respect, collegiality and professionalism, and ensure that differing views are expressed and considered fairly. They must support clear, well-founded and consistent decisions, duly substantiated, and respect the collective nature of SC's officially adopted decisions.
- Avoid conflicts of interest and situations in which their personal interests might call into question their objectivity or the impartiality of their decision. Members of the SC are required to declare any actual, potential or apparent conflict of interest that may affect, or is likely to be perceived as affecting, their independence, objectivity or impartiality. Where a potential conflict of interest exists, the member concerned must be excluded from any discussion, evaluation, consultation or decision-making relating to the procedure in question, and the exclusion, as well as the measures taken to manage the conflict, must be recorded. The recusal procedure must be conducted in transparency, and alternative measures must be put in place to ensure integrity and objectivity.
- Avoid seeking or accepting gifts, benefits or any other advantage that may influence, or is likely to be perceived as influencing, their independence, objectivity or judgement. Any offer of such benefit made in connection with their role must be declared immediately in accordance with the applicable rules and regulations of HAHE.
- Maintain the confidentiality of all non-public information, documents, deliberations, opinions, draft texts, personal data and information that comes to their attention in the course of their duties. Such information is used exclusively for the purposes of the relevant procedure and is processed in accordance with the principles of lawfulness, transparency and security, in accordance with the applicable Data Protection legislation and the values and code of ethics of HAHE.

2. Members of the Evaluation and Accreditation Council (EAC) of HAHE

The following rules of ethics and professional conduct govern the performance of duties by members of the Evaluation and Accreditation Council (EAC) of the Hellenic Authority for Higher Education (HAHE) within the framework of the accreditation decision-making process and any related activity falling within their institutional remit. They shall apply to all members of the

EAC throughout the preparation, examination, deliberation, adoption and follow-up of accreditation decisions.

The EAC members submit the Accreditation Reports to the Supreme Council for Study Programmes falling within the group of sciences they oversee, except in the case of departments at the Higher Education Institution where they are currently employed or from which they have retired. For these Reports, another member is appointed from a related group of sciences.

In the exercise of their duties, members of the EAC act in accordance with the applicable legal and regulatory framework, the HAHE Quality Standards, the procedures for conducting accreditation, and the principle of impartial decision-making.

In particular, the EAC members shall:

- Carry out their duties with professionalism, accountability, diligence, responsibility and in accordance with the law.
- Exercise their professional judgement independently and base their decisions exclusively on the Accreditation Report, the applicable Quality Standards, the material lawfully submitted as part of the accreditation process, and the requirements of HAHE'S operational framework. They shall not allow personal opinions, collaborations with Institutions, prior connections, external pressures, political expediency or personal interests to influence their assessment or decisions.
- Act in a spirit of collegiality and cooperation. Members of the EAC participate in deliberations with respect, collegiality and professionalism, and ensure that differing views are expressed and considered fairly. They must support clear, well-founded and consistent decisions, duly grounded in the course of the procedure and in the applicable Standards, and respect the collective nature of the EAC's formally adopted decisions.
- Not engage in direct or indirect communication with the Institutions under review, members of the EEAP or any third party with the aim of exerting undue influence, anticipating or informally determining the outcome of an ongoing accreditation process. All communication relating to accreditation procedures shall take place solely through the officially designated channels and in accordance with the applicable regulatory framework.

- Avoid conflicts of interest and situations in which their personal interests could call into question their objectivity or the impartiality of their decision. The EAC members are required to declare any actual, potential or apparent conflict of interest that may affect, or is likely to be perceived as affecting, their independence, objectivity or impartiality in relation to a specific accreditation procedure. Where such a potential conflict exists, the member concerned must be excluded from any discussion, assessment, deliberation or decision-making relating to that procedure, and the exclusion, as well as the measures taken to manage the conflict, must be documented. The recusal procedure must be conducted transparently, and alternative measures must be put in place to ensure integrity and objectivity.
- Refrain from seeking or accepting gifts, benefits or any other advantage that may influence, or is likely to be perceived as influencing, their independence, objectivity or judgement. Any offer of such benefit made in connection with their role must be declared immediately in accordance with the applicable rules and regulations of HAHE.
- Maintain the confidentiality of all non-public information, documents, deliberations, opinions, draft texts, personal data and information that comes to their attention whilst carrying out their duties. This information shall be used exclusively for the purposes of the accreditation process and shall be processed in accordance with the principles of lawfulness, transparency and security, in accordance with the applicable Data Protection legislation and the HAHE ethics and values.
- Abstain from the discussion and decision-making regarding the accreditation of a Study Programme at the relevant EAC meeting, where the Programme in question belongs to the Institution at which they are currently employed or from which they have retired.

3. HAHE staff: Coordinators of the HAHE External Evaluation and Accreditation Review

The HAHE Review Coordinators play a key role in ensuring the smooth running and reliability of the review process, acting as the main point of contact between the External Evaluation and Accreditation Panel (EEAP), the Institution under review and HAHE's internal administrative structures. Consequently, their conduct must demonstrate the fundamental values that underpin the operation of HAHE: Integrity, Accountability, Respect, Collaboration and Continuous Improvement. The following rules set out the conduct and ethical requirements

for HAHE Coordinators, whether they are permanent staff members or external collaborators of the Authority.

The Coordinators of HAHE shall:

- Carry out their duties with professionalism, diligence, competence, a strong sense of responsibility and dedication to HAHE's mission of quality assurance.
- Treat members of the EEAP and the Institution's representatives with due respect, impartiality, dignity and professional courtesy.
- Act as the main point of contact and coordination between the EEAP and the Institution throughout the accreditation process, ensuring that communication takes place exclusively through the officially designated channels and procedures. In this capacity, the coordinators shall facilitate any request of the Panel for additional information or supporting documentation from the Institution, without assessing, acting selectively or prejudging the relevance or significance of such requests.
- Communicate clearly, accurately and in a timely manner with all stakeholders of the review, ensuring that all stages of the accreditation process are properly documented and traceable. Any guidance is strictly limited to the procedural and formal aspects of the review process and does not constitute guidance on substantive quality issues or on the presentation of evidence.
- Avoid any attempt to influence, guide or shape the Panel's deliberations, judgements, opinions or conclusions, and ensure that it is made clear in all communications that the final accreditation decision is taken by the Evaluation and Accreditation Council (EAC) of HAHE.
- Treat all information that comes to their attention during the review process as strictly confidential and shall refrain from disclosing confidential documentation or information to third parties outside the review process. This obligation shall continue to apply even after the review process has been completed.
- Process all personal data lawfully and securely, in accordance with the General Data Protection Regulation (GDPR) and applicable National Data Protection Legislation, and use such data exclusively for the purposes of coordinating the review process.
- Be excluded from any stage of the review process where there is an actual, potential or apparent conflict of interest. A conflict of interest is deemed to exist where the personal,

professional or other interests of a HAHE Coordinator hinder – or are likely to be perceived as hindering – their objectivity or impartiality in relation to a specific review process.

4. Members of the External Evaluation and Accreditation Panel (EEAP)

All members of the EEAP are required to read, understand and abide by the following rules of ethics and professional conduct throughout the accreditation process, as a pre-condition for their participation in the EEAP. The EEAP members must declare in writing that they have read and accept the Code of Ethics. Any breach of this Code may result in the termination of the member's membership of the EEAP and their exclusion from future External Evaluation and Accreditation Panels of HAHE.

The members of the External Evaluation and Accreditation Panels (EEAPs) commit themselves to:

- Act with professionalism and academic competence. The EEAP members shall apply their knowledge and experience with diligence, impartiality and in good faith, adhering to the highest standards of professional ethics throughout the review process.
- Treat the members of the Institution under review, the review coordinators of HAHE and other participants with due respect and professional courtesy, and refrain from any confrontational, disparaging or otherwise inappropriate behaviour.
- Act with integrity, objectivity and confidentiality. Panel members must exercise impartial judgement based on their expertise, solely on the evidence presented and the applicable Accreditation Standards, without being influenced by any external influence, any potential inducement or personal bias.
- Examine the information and data submitted in detail, and act with transparency, consistency and accountability, ensuring that their assessments are clearly justified and evidence-based.
- Base their assessments on the findings of the process and to bear in mind that the accreditation process is primarily aimed at improvement, and not merely at identifying weaknesses.
- Take into account the context of Greek Higher Education.

- Follow the Guidelines of HAHE and adopt the principles and philosophy of quality assurance and continuous improvement.
- Use the Mapping Grid and take due account of the applicable Accreditation Standards throughout the site visit. All assessment areas and principles must be adequately examined, either through the review of the submitted documentation, through interviews with representatives of the Institution and stakeholders, or through a combination of both. No criterion or principle should be regarded as less important, taken for granted or considered sufficiently substantiated on the basis of common knowledge, such that it is exempt from the Panel's obligation to carry out an independent and thorough verification. Each area of assessment is examined separately, in accordance with the Panel's obligation to conduct the review process thoroughly, on the basis of evidence and consistently.
- Foster a spirit of cooperation, mutual support and shared professional responsibility. Members shall encourage open and effective communication amongst themselves, actively contribute to the exchange of knowledge and expertise, and ensure that all their judgements and findings are the result of meaningful collaboration and collective deliberation.
- Always treat other members of the EEAP, as well as the representatives and participants of the Institution concerned, with respect, impartiality and dignity. Members of the Panel must refrain from any form of discrimination. They must ensure that every member of the Panel has an equal opportunity to ask questions and to contribute actively to the creation of an inclusive evaluation environment, in which all participants are given sufficient space and time to express their views and respond to the Panel's questions, within the time frame set for the meeting.
- Work collectively as a team under the guidance and coordination of the Panel Chair and adhere to the set deadlines.
- Avoid any situation in which a conflict of interest might arise. Members of the Panel must inform HAHE of any connection with the Higher Education Institution / University Legal Entity (and its parent institution) or the study programme under review (for the current period or over the last five years), as well as any planned collaboration or other relationship, so that their impartiality is not called into question. Circumstances which may lead to a conflict of interest for Panel members include, by way of example, professional or research collaborations with members of the academic staff of the Institution in

question, special honours received from the Institution, as well as any other relationship involving personal, financial or other benefit, or which may influence or be perceived as influencing the impartial and objective performance of their duties. HAHE shall examine each case separately.

- Respect the fact that the evaluation must under no circumstances be used as a means of promoting personal interests. Those who have served as members of External Evaluation and Accreditation Panels must refrain from using information relating to evaluations for financial gain (e.g. by providing consultancy services to University Legal Entities / Higher Education Institutions that they have reviewed).
- Maintain absolute confidentiality regarding the review process, both during its course and after its completion, in respect of all matters that have come to their attention, and not to disclose any confidential information acquired or made known to them in the course of their duties. Such confidential information must be used exclusively for the purposes of the evaluation and must not be disclosed to third parties.
- Confirm that they are aware of the collection and processing of the personal data they have provided to HAHE and/or which is received by HAHE via the declaration available at the HAHE link: https://www.ethaae.gr/en/terms-of-use .
- Given that the purpose of the Accreditation Report is to set out the conclusions regarding compliance with the Standards and to formulate recommendations for improvement, based on the findings and their analysis, the EEAP must arrive at a clear, consistent and fully substantiated judgement, based on consensus.

5. Institutions subject to the External Evaluation and Accreditation review

All members of the institutions, as well as external stakeholders participating in the review process of Higher Education Institutions (HEIs) and University Legal Entities (ULEs) are bound by the following rules of Ethics and Conduct. Compliance with these rules is a prerequisite for ensuring the integrity and validity of the accreditation process. Any serious or repeated breach on behalf of the Institution may affect the accreditation process. HAHE reserves the right to take into account the nature and extent of the breach when making its accreditation decision.

All members of the Institution and invited individuals participating in the review process on behalf of the Institution must comply with the following principles:

- The Institution bears full responsibility for the accuracy and validity of all information submitted in the accreditation proposal, as well as any additional material that may be requested during the review.
- The Institution is not permitted to publicise the commencement of a Study Programme (student enrolment, start of courses) prior to its accreditation.
- All information provided to the External Evaluation and Accreditation Panel and to HAHE must be accurate, complete and in accordance with the applicable institutional and regulatory framework. The deliberate concealment, or the misleading or selective presentation of information, may be considered a breach of this Code.
- Any potential conflict of interest involving a member of the External Evaluation and Accreditation Panel must be disclosed in writing to HAHE, with appropriate supporting documentation, no later than three working days after the announcement of the Panel's composition.
- The Institution must comply with all procedural requirements laid down by HAHE, including the preparation and submission of proposals and supporting documentation, and adherence to deadlines. Changes to the schedule of the site visit, whether regarding the order or duration of meetings, are not permitted except for serious reasons and subject to prior approval by HAHE.
- HAHE is responsible for communicating with the members of the Panel and for forwarding any relevant information to them. Any direct communication between the University's administration or teaching staff and members of the Panel prior to the review is considered improper and may call into question the validity of the review process.
- In particular, during the site visit (whether on site or remote), all participants must:
    - Treat the members of the Panel, the review Coordinators and other participants with due respect and professional courtesy, and refrain from any confrontational, disparaging or otherwise inappropriate behaviour. The Institution assumes full responsibility for the appropriate conduct of all its representatives throughout the review process.

- Answer the Panel's questions honestly, transparently and constructively, providing clear and substantiated answers.
- Allow other participants to express their views without interruption and to ensure that an inclusive environment is maintained, in which all voices can be heard, within the time limits set for the meeting.
- Avoid directing, guiding or otherwise influencing other participants' responses, either before or during the interviews.

- Any comments on the draft Accreditation Report submitted to HAHE as part of the review process should be limited to highlighting potential factual errors and should not include any direct evaluative judgement on the assessment or on the recommendations made by the Panel.
- The Institution must not disclose, discuss or circulate in any way information relating to the Panel's preliminary findings or assessments prior to the official publication of the Accreditation Report by HAHE.

6. Implementation and Monitoring of Compliance with the Code

The competent body for implementing and monitoring compliance with the Code of Ethics shall be the Supreme Council of HAHE.

Athens, 6 November 2026

The President

Pericles A. Mitkas